

REMARKS

This is in response to the Official Action currently outstanding with respect to the above-identified application, which Official Action the Examiner designated as being FINAL.

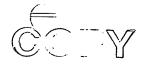
Claims 1-37 were originally presented. Claims 26-37 were elected for further prosecution and Claims 1-27 were cancelled previously, without prejudice. Claims 38-55 were subsequently added by Amendment. Thereafter, Claims 30 and 40 were canceled, without prejudice, and Claims 28, 31, 32, 35, 36, 37, 38, 41, 42, 46, 47 and 52 were amended. By the foregoing Amendment, Applicants respectfully request that Claims 28, 31-34, 36-38, 41-53 and 55 be amended. Applicants do not presently request the cancellation, withdrawal or addition of any claims. Accordingly, in the event that the Examiner grants the entry of the foregoing Amendment, Claims 28-29, 31-39 and 41-55 as hereinabove presented will constitute the claims under active prosecution in the above-identified application. Applicants respectfully submit that (i) no new matter is introduced into the claims of this application by the foregoing Amendment, and (ii) entry of the foregoing Amendment will place this application in condition for allowance, or at least in better form for Appeal, as required by 37 CFR 1.116.

The claims of this application as they will stand in the event that the Examiner grants the entry of the foregoing Amendment Accompanying Request for Continued Examination are set forth in full hereinabove as required by the Rules.



More particularly, in the currently outstanding Official Action, the Examiner has:

- Re-acknowledged Applicants' claim for foreign priority under 35 USC 119(a)-(d) or (f), and also reconfirmed the receipt of the required certified copy of the priority documentation by the United States Patent and Trademark Office.
- Confirmed that the drawings originally filed with this application on 14
 September 2000 have been accepted;
- 3. Acknowledged Applicants' Information Disclosure Statement of 21 March 2006 by providing the Applicants with a copy of the Form PTO/SB/08a/b duly signed, dated and initialed by the Examiner in confirmation of his consideration of the art cited therein;
- 4. Withdrawn his previous rejection of Claim 38 under 35 USC 112 in view of Applicants' last filed Amendment;
- 5. Rejected Claims 28, 31, 33-36, 38-39, 41 and 43-46 under 35 USC 103(a) as being anticipated by the Portable Document Format Reference Manual, Version 1.2 that is attributed to Bienz in view of the Mastie reference (US Patent No. 6,480,866;
- 6. Rejected Claims 29, 37 and 47-55 under 35 USC 103(a) as being unpatentable over the Portable Document Format Reference Manual in view of the Mastie reference and further in view of the Warlock et al reference (US Patent No. 5,634,064);



7. Rejected Claims 32 and 42 under 35 USC 103(a) as being unpatentable over the Portable Document Reference Manual, Version 1.2 in view of the Mastie reference and further in view of the Ota reference (Japanese Patent No. 5-323941); and

No further specific comment regarding items 1-4 above is deemed to be required in these Remarks.

The foregoing amendments are being made for the purpose of clarifying the fact (that Applicants heretofore believed to be inherent in the claims as they previously stood) that the present invention includes the formation of scrolling paths running from display element to display element and also display paths running from display element group to display element group. In other words, the present invention is not to be in any way understood to be limited to scrolling pathways running from individual display element to individual display element, although as will hereinafter be discussed in greater detail the latter feature of the present invention clearly distinguishes the present claims from the art relied upon by the Examiner. The present invention also contemplates that contiguous groups of display elements along with the management information associated with the display of each element of the group may be selected and a scrolling path running from one such group to another to another etc. sequentially is specifically within its scope. Hence, the foregoing Amendment is being made to reflect the fact that the present invention is not to be understood as being limited to scrolling sequentially from one display element to the next by virtue of a limited reading of the terminology utilized in the claims prior to the foregoing Amendment.



In the previous Official Action in this case, the Examiner indicated that:

"In response, the Examiner agrees with the Applicant that a PDF "page object" cannot be considered a "pre-specified unit" or a distinct file like claimed. However, the Examiner respectfully notes that the claimed invention does not explicitly recite or suggest storing a document in the form of a plurality of pre-specified units or distinct files, and also notes that the claimed invention does not explicitly recite or suggest that the pre-specified units are each use to generate only a single page of the document. The Applicants suggest that the claimed invention is directed towards storing an entire document in the form of pre-specified units. No claim, however, explicitly indicates such a feature. For example, Claim 28 makes no mention of a document, reciting only a data storage medium, having at least one pre-specified data unit recorded thereon. Claim 29, dependent from Claim 28, associates a pre-specified unit with a page of a document, but recites only that "each pre-specified unit includes the display elements associated with a document page". Therefore, the claims of the present application do not limit a pre-specified unit or distinct file to representing only a portion of a document."

In view of these comments, Applicants previously amended independent claims 28 and 38 (the only pending independent claims) so as to recite:

"...said data storage medium having a plurality of pre-specified data units that together define a document recorded thereon..."

and

"...said data storage medium having display data associated with an entire document recorded thereon, said display data including a plurality of image data objects for display on a display screen of said display device and all management information associated with each of said image data objects required by said display device for the display, including the scroll display, thereof,



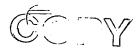
comprising:

a computer readable medium on which said display data is recorded in the form of distinct files, each said distinct file containing a pre-selected portion of said display data including at least one of said plurality of image data objects along with all of the respective associated management information required by said display device for the display..."

respectively.

Applicants also amended claims 28 and 38 so as to clarify the fact that the intervals forming a scroll path are specified by line segments respectively defined by coordinate values of a starting point and an end point according to coordinate values assigned to the display elements in the pre-specified unit. Applicants noted that this alteration of the phraseology of Claims 28 and 38 simply clarified the fact that while each of the intervals forming the scroll path has a direction associated with it, it is within the scope of this invention as currently claimed that some or all of the directions associated with the respective intervals may be in line with one another. Hence, Applicants indicated that the scope of the claims was not altered and no new matter was added by these clarifying amendments.

The currently outstanding FINAL rejections of this application are essentially the same as those heretofore stated by the Examiner earlier this prosecution. The difference between the previous rejections and the currently outstanding rejections appears to reside in (1) the Examiner's construction of a PDF file representing a single page as being equivalent to the claimed "pre-specified data unit", and (2) the Examiner's addition of the Mastie reference to his outstanding grounds for rejection such that the currently outstanding rejections are all based upon 35 USC 103(a) – the Examiner's rejections based upon anticipation under 35 USC 102 have been dropped in the currently outstanding FINAL Official Action.



In the following Remarks, Applicants will demonstrate that the Mastie reference is inapposite to the present invention both when considered alone and when considered in light of the PDF Reference Manual. Thereafter, Applicants will repeat their previous response to the points raised by the Examiner for the sake of a complete presentation in this Amendment and further comment upon the Examiner's apparent misunderstanding of the meaning of the phraseology of the present claims. Finally, Applicants will offer a further analysis of the Examiner's currently outstanding rejection that tends to indicate that he has failed to correctly understand the meaning of the wording of the claims of this application.

First, with respect to the currently outstanding rejections based in whole or in part on a combination of the PDF Reference Manual and the Mastie reference, Applicants note that the Examiner previously requested Applicants' comments concerning the Mastie reference without formally relying upon the same. At that time Applicants noted that:

...the Mastie reference indicates that it stores data by "pages" or by "documents". As far as Applicant can presently determine, however, the electronically stored so-called "page" files of the Mastie reference contain data but do not include the reproduction and display information that is required to be associated with the page data stored in those "page" files for the display thereof (see Mastie, Col. 4, lines 14-28). On the other hand, the so-called "document" files of the Mastie reference (that as far as Applicants can determine constitute one or more completely formatted page units) define a set data format with no ability to display selected portions thereof in a scrolling sequence or otherwise differently from the single predetermined format stored with the display data therein (i.e., in the Mastie reference the format of the "document" and its associated display data are set and saved together as a distinct and unalterable unit with no means for partial viewing, scroll viewing of selected portions thereof or any of the other flexibility provided by a PDF document file or by the present invention).



Despite the foregoing, the Examiner asserts at page 6 of the currently outstanding FINAL Official Action the novel position that since (1) Mastie discloses storing each page of a document in a single file and the assembly of a plurality of such "page files" into a "document", and (2) a PDF file may describe only a single page, it would have been obvious to one skilled in the art at the time that the present invention was made to form the individual Mastie "page files" in the form of PDF files and also to combine those individual "PDF page files" into a single document. From this conclusory position, the Examiner's logic proceeds along the lines that in the resulting "document" each of the "PDF page files", which arguably may be considered as a distinct units, meet all of the criteria of the presently claimed "pre-specified data units".

Furthermore, based upon the foregoing reasoning, the Examiner ultimately concludes that the combination of the Portable Document Format Reference Manual and the Mastie patent is sufficient to render the present independent claims unpatentable within the meaning of 35 USC 103(a).

In response, Applicants respectfully submit that the Examiner's present position as summarized above cannot withstand critical analysis. Specifically, Applicants respectfully submit that the Examiner's position is dependent upon a semantic characterization of the disclosures of the Portable Document Format Manual and the Mastie reference that is inaccurate.

Hence, while it appears to be true that a PDF document may be made up of a single page, it nevertheless also is true that each page of a Portable Document Format document (whether that document be a page or multiple pages) is stored in the form of "page objects" without formatting or display information per se as has been discussed in detail previously in this prosecution and repeated hereinbelow. In other words, the very fact that the Portable Document Format refers to itself in terms of a "document" is respectfully submitted to be indicative of the fact that the consideration of a PDF document as a "page unit" that remains a "distinct page unit" when combined with other such PDF documents makes little sense.



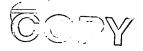
Further, the formatting and display information associated with the various "page objects" that make up a PDF document "page" are stored separately from the page objects that describe the content and functionality of each single document page that is accessed via the so-called "page tree". Further, it is to be understood that an article bead is one of the managerial elements of the PDF document file structure (whether that file be a single or a multipage document) that functions with the format information such that "page documents" ("files") such as those disclosed by Mastie can be utilized (i.e., read) in the form of "articles" made up of sequential selections located at various positions on one or more of the "pages". Thus, as noted hereinabove, "... the Examiner agrees with the Applicant that a PDF "page object" cannot be considered a "pre-specified unit" or a distinct file like claimed.

Consequently, Applicants respectfully submit that it is somewhat disingenuous for the Examiner now to characterize a PDF file as a "page unit of a document" in an attempt to invalidate the present claims. As has been noted previously, a PDF file is by definition a "document" whether the content of that document be one page or multiple pages. Accordingly, the fact that a particular PDF document made up of the information associated with a single page might (when taken as a unit apart from the constituent "page objects" and associated separately stored formatting and display information from which it is formed) be part of a master document that is made up of more than one page in a context in which those pages are to be separately printed does not change the fact that the single page PDF file is in fact a document as herein claimed. In other words, a PDF document representing a page of information is still a document that is made up of objects stored separately from their associated formatting or display information even though for some purposes that document may be utilized as a unit (such as when it is printed out regardless of whether or not such a printout is to be utilized with other printouts to form what might also be characterized as a document).



Thus, while it of course is true that a printed "document" could be composed of multiple printouts of "page files" and that each of the "page files" could be formed as a PDF file as described generally at Column 3, lines 1-15 of the Mastie reference, Applicants respectfully submit that that fact must be recognized in conjunction with the fact that the Mastie patent specifically discloses that <u>it may be necessary to modify the respective "page files" to conform to the formatting of the "document" prior to storing the assembled composite document that includes all of the page files that make up the document. See Mastie at for example Column 3, lines 39-50; Column 6, Line 60 to Column 7, line 2; Column 7, line 24 to Column 8, line 20. The latter point is respectfully submitted to be an indication that in the case that each of the "page files" referred to by Mastie is assumed to be a PDF file, the final document will be a PDF document having the structure previously discussed in detail (an repeated hereinbelow). Further, it is to be noted again that the Examiner has agreed that "a PDF "page object" cannot be considered a "prespecified unit" or a distinct file as claimed".</u>

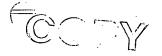
Accordingly, Applicants respectfully submit that the Examiner's subtle twist to his previous rejections in the currently outstanding Final Official Action is not supportable. In particular, while this fact may be obscured by the various semantic permutations and combinations that are possible concerning a characterization of how data may be stored in the present context, the indisputable fact remains that even if one were to assume that each of the "page files" disclosed by the Mastie reference was a PDF file, there is absolutely nothing anywhere in the art that would teach, disclose or suggest to a person of ordinary skill in the art at the time that the present invention was made that those "PDF page files" should be assembled somehow with one another according to the Mastie disclosure as anything other than a "PDF document file" wherein the various "page objects" are stored separately from their associated formatting and display information as disclosed in the PDF Reference Manual.



Applicants respectfully submit in this regard that it simply would make no sense to anyone of ordinary skill in the art to assemble a plurality of PDF files representative of individual pages into any common document format other than a PDF document format representative of the entire "document". This is the case both because of the nature of the document files to be combined into a composite file and because the Mastie reference itself specifically indicates that all of the files to be assembled into a document file are to be altered such they all fit into a common format. Clearly, the most efficient way for a plurality of PDF documents to be assembled into a single document having common formatting and display characteristics would be to adopt a format wherein the format and display characteristics can be stored once so as to apply as required to all of the various page objects representative of the information of the various "pages" of the composite "document" as described in the PDF Reference Manual.

In short, the Mastie reference does not teach simply that the various page files discussed therein are to be assembled into a composite document file. Rather, Mastie teaches in addition that all of the individual document files are to be integrated with one another into a common whole. Applicants respectfully submit that the Examiner has totally failed to recognize the latter point or to take it into consideration in the currently outstanding Final rejection.

Therefore, Applicants respectfully <u>traverse</u> the Examiner's outstanding FINAL rejection and request reconsideration in response to this communication for the reasons discussed above. In addition, Applicants respectfully submit that it is not proper to pick and choose among isolated elements of the prior art to the exclusion of associated elements tending to teach away from the purpose for which the particular prior art element is being relied upon (i.e., there is no motivation in the art to make the combination suggested by the Examiner since it changes the mode of operation of the Mastie reference – see MPEP 2143.02 (VI).



Further, at least with respect to the Mastie reference, therefore, Applicants respectfully submit that it is clear that any PDF file representing a page would be subsumed <u>as a non-distinct unit (i.e., an integral inseparable part of the whole)</u> into the composite document contemplated in that reference.

With respect to the Portable Document Format reference, Applicants again respectfully submit that it is important to clarify their understanding of the structure and parameters of that reference for the record. The reason for this is that Applicants believe that the basis for the Examiner's continuing rejections of this application arise not from the substantive structures and modes of operation of the present invention vis a vis the Portable Document Format reference, but rather arise from a semantic argument based upon the unfortunately imprecise phraseology chosen for use in the reference.

This problem is believed to arise from the fact that the reference was written for programmers with the goal of explaining the various facets of the Portable Document Format and the interrelationships of those facets with one another rather than as a strictly accurate description of the contemplated groupings of data and managerial functions within the overall PDF document structure. More specifically, it is Applicants' position that the Portable Document Format is based upon documents taken as a whole, and that each page of a Portable Document Format document is stored in the form of "page objects" without formatting or display information per se. In other words, the formatting and display information associated with the various data objects is stored separately from the page objects that describe the content and functionality of each single document page that is accessed via the so-called "page tree". Further, an article bead is one of the managerial elements of the PDF document file structure that functions with the format information such that "page documents" such as that disclosed by Mastie can be utilized (i.e., read) as "articles" made up of sequential selections located a various positions on one or more "pages".

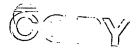
CCTY

H. Saiga, et al. U.S.S.N. 09/646,194 Page 25

Applicants, therefore, respectfully again submit that the PDF reference, like the Warnok, et al reference, is directed to storing *entire documents or the like* (on a page-by page basis) in a computer memory as a so-called "PDF (Portable Document Format) documents". The difference between the Warnock reference and the PDF Manual reference relied upon in support of the present rejections is as follows.

In the Warnock reference, the components of an article contained within a document and the so-called "thread" connecting (associating) those components with one another is added (accomplished) **after** the document is stored. On the other hand, in the PDF reference presently relied upon, the definition and association of article components are accomplished **concurrently with** the storage of the document. Applicants respectfully submit that this distinction is insufficient to justify the Examiner's rejections (i.e., to render the currently pending claims unpatentable).

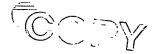
More particularly, despite the Examiner's detailed analysis of the Portable Document Format Reference Manual, the fact remains that present invention stores the display data associated with an entire data grouping together, rather than in a form dependent upon selections from the catalog of display and formatting functions stored for the entire document. This display data includes image object data, management information associated with each stored image object data and scroll information associated with each image object data, in distinct, separately controllable pre-specified units (i.e., distinct files) containing only a portion of all of the display data associated with a document to be stored on the storage medium and in direct association with the management information specifically associated therewith. This is different from the so-called dynamic formatting referred to by the Warlock, et al. reference as being unsatisfactory as well as being different from the disclosures of the Portable Document Format Reference Manual. In both of those references it is necessary to store the entire document or the like in a computer memory as a so-called "PDF (Portable Document Format) document" before any portion ("pre-specified data unit") can be accessed or displayed.



The manner in which the Portable Document Format Reference Manual describes the individual elements of that format relative to the way in which it actually works is unfortunate because the foregoing distinctions are not clear. As alluded to above, it is Applicants' belief that this is the result of the fact that the PDF Reference Manual attempts to describe the Portable Document Format from the perspective of each of its different levels of complexity separately as a means of aiding program developers and others in the use of its various features.

Applicants again respectfully submit and emphasize, however, that a close reading of the PDF Manual clearly suggests that while the Examiner's factual analysis concerning the "bead" concept of identification of article segments and the page coordinate definition of each article segment may seem to be supported by the PDF Manual, the Examiner has forgotten (or not noticed) that no matter how one approaches the PDF format, it is necessary in the use of each page, or article portion thereof to refer back to information stored as part of the whole PDF file outside of the so-called "page objects" (Note: the PDF Reference Manual discusses PDF files as representative of entire documents including a header, a body, a cross-reference table and a trailer (see chapter 5) wherein the body is made up of various indirect objects such as fonts, pages and sampled images, see page 62).

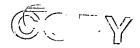
Thus, despite other similarities to the present invention, in the article and/or page context, the PDF Reference Manual makes it clear that each selected portion of a so-called "page" that is defined by the so-called "beads" must refer back to the so-called "Contents" parameter of the "page" of which it forms a part. Hence, each article portion must refer back at least to the page information from which it is extracted in order to be appropriately utilized in a scrolling display of an entire article (particularly an entire article having different portions on different pages).



In fact, while it is possible to create PDF units containing one or more separate document pages, there is no provision in the PDF format for saving the data and management information representing defined article segments as separate prespecified units (Claim 28) or distinct files (claim 38).

Further, while the PDF Manual at certain points seems to broadly suggests that each so-called "page" may be basically separate unto itself as an abstract concept, the true, real world fact is that at least part of the display information and associated scroll information for each such page depends upon information created and saved in the body portion of the PDF file separately from the page objects (data) in question during the course of the creation and saving of an entire PDF format type document.

In other words, the pre-specified units of the present invention to the extent that they individually represent pages or article portions contain within themselves all of their own display information, including scroll display control information. The PDF Document Format, on the other hand, does not contemplate that each so-called "page" is to be a pre-specified unit in the sense of the present invention. This is because the display control including scroll display information (for example, the required drivers) are embedded in the PDF file and associated with the data to be displayed by higher level operators associated with the data via catalogs that assemble the various objects making up the body of the PDF file to achieve the desired complete document display. Thus, while the PDF Reference Manual at first reading appears to be discussing the manipulation of documents, pages of documents and article threads running through the documents, a more detailed reading of that manual indicates that the foregoing is but the highest level of explanation of the actual PDF concept. This is readily apparent to anyone who has used a PDF document obtained from an outside source from the fact that the entire document has to be downloaded and processed by the computer involved before any part of the PDF document can be accessed for use.



When reduced to its basics, therefore, Applicants respectfully submit that the PDF concept stores "documents" in the form of "pages" (i.e., groups of page objects) separately from at least some of the data contemplated as being necessary for display of the individual image data (page objects), and separately from all of the other information necessary for the association of that image data ("page objects) in the form of appropriate control sequences including the parameters required to achieve the association and control of the display of various combinations of the image data ("page objects") as desired.

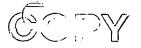
Accordingly, Applicants respectfully submit that the PDF Manual clearly indicates that the PDF concept might be characterized as including a PDF file containing all of the information making up the document in a database sort of collection (the so-called "body") including various levels of association of that data that can be accessed and displayed or otherwise used. Hence, it is clear that the so-called "threads" connecting the various portions of an article in the PDF Reference Manual are not the same as (or even akin to) the vectors within the article components of the present invention.

In support of the latter interpretation, Applicants respectfully call attention to the fact that at page 27 of the PDF Manual it is indicated that a PDF file contains a PDF document and other supporting data. Further, the PDF Manual states that in addition to a document a PDF file contains the version of the PDF specification and information about the location of important structures within the file. Further, at page 28 the PDF Manual indicates that the required printer driver consists of a stream of commands that are converted into PDF operators which are embedded in the PDF file. Also, page 62 the PDF Manual indicates that the body of a PDF file consists of a sequence of indirect objects representing a document, and that those objects represent components of the document such as fonts, pages and sampled images.



Therefore, Applicants respectfully submit that it is not surprising that in the discussion of optimized PDF files the PDF Manual notes that it is contemplated that the various "pages" of a PDF document will <u>share</u> objects and resources. It also is not surprising that the various pages are contemplated to have <u>common attributes</u> and that those common attributes may and will be "inherited" from the preceding page unless otherwise specified. See, pp 77-78; Section 7.4 and pp. 254, 270 and 274.

Consequently, as emphasized above and now specifically claimed in each of the independent claims of this application, the PDF Manual does not disclose that the management information including scroll display information associated with each image data object or contiguous group of data objects is maintained in association with that image data object or group of objects in a pre-specified unit (distinct file) within which it is stored, nor does the PDF Manual disclose that a complete formatted document, document portion or the like may be separately reproduced by an associated display device using only the management information including scroll display information contained in each of various pre-specified units (i.e., distinct files) in linked association with one another. The PDF document is stored and utilized as a complete whole even in those cases wherein only a specific article or the like is actually displayed and read by the user.



In addition, Applicants respectfully submit that the Examiner has misunderstood the Applicants' use of the word "intervals" in the claims of this application as applying to parameters akin to the "T", "N" and "V" parameters of the PDF Reference Manual that identify the line segments having different directions in a coordinate section defined by the PDF file, i.e., the "thread" I defined as the "scroll path" in the PDF Reference Manual) connecting the various "beads" associated with the article content portions delineated by the "R" parameter. In fact, however, Applicants respectfully submit that upon closer consideration the Examiner will understand that the presently claimed "intervals" more closely correspond to the article content portions delineated by the "R" parameters (i.e., the "beads") of the PDF reference Manual. In support of this interpretation, Applicants respectfully refer the Examiner to pages 81-97 of the present specification whereat it is explained that the arrows in the Partial Blocks identified in Fig. 37 within the respective pre-specified display units are the "intervals" that together form a "scroll path" of the display element content along which said scroll display is to be conducted in the present invention and the method by which that is accomplished is explained. In other words, the "scroll path" in the present claims is the path made up of the actual display elements that are to be displayed, not the path connecting rectangles surrounding various portions of an article content to be displayed sequentially according to their respective positions along the "scroll path" (or thread) of the PDF Reference Manual.

To clarify the latter point, the claims of this application were previously amended so as to more clearly indicate that the "intervals" as herein claimed refer to portions of the actual display element content that together make up a "scroll path" that defines the display element content of the respective prespecified display data units or portions thereof that are to form the actual content of the "scroll display" (i.e., the predetermined sequence of data elements"). Applicants propose that Claims 48-53 be further amended as shown above so as to further clarify this point of distinction between the present invention and the art relied upon by the Examiner.



Thus, as previously noted, each "interval" in the present invention has a direction associated with it, and some or all of those directions may be the same or different depending upon the particular scroll path (data content) to be displayed. Accordingly, the portion of the present invention that links the "intervals" with one another is part of the information for selecting among the display elements for scroll display to be found in the "predetermined sequence" in which the display elements are displayed. Further, as now clarified, the information for selecting among the display elements for scroll display linking the "intervals" may take the form of information specifying vectors associated with the content of the pre-specified units or distinct files herein claimed.

Accordingly, in addition to the reasons discussed above that distinguish the present invention from the disclosure of the PDF Reference Manual disclosure, Applicants respectfully submit that the present invention is clearly and unambiguously distinct from any and/or all of the art cited by the Examiner taken alone, or any combination thereof, by the fact that the "scroll path" hereinabove claimed is a scroll path defined by "a starting point and an end point in a coordinate system defined by said pre-specified unit according to coordinate values assigned to the display elements in said pre-specified unit". Specifically, this is to be distinguished from a scroll path defined by factors such as "T", "N" and "V" parameters used to define pathways between the various portions or sections of a document represented by a PDF file defined by the "R" parameter that is denoted by 4 values, wherein those 4 values identify the coordinate values of the corners of a rectangle <u>surrounding the associated</u> article content" in a coordinate system assigned to the content of the entire document of which those portions form a part by the PDF file as described in the PDF Reference Manual.



In view of the foregoing Amendment and Remarks, it is respectfully submitted that all of the claims that will be present in this application upon the entry of the foregoing Amendment are in condition for allowance, or at least in better form for Appeal, as required by 37 CFR 1.116. Accordingly, entry of the foregoing Amendments, reconsideration and allowance of this application in response to this communication are respectfully requested.

Applicants also believe that additional fees beyond those submitted herewith are not required in connection with the consideration of this response to the currently outstanding Official Action. However, if for any reason a fee is required, a fee paid is inadequate or credit is owed for any excess fee paid, you are hereby authorized and requested to charge and/or credit Deposit Account No. **04-1105**, as necessary, for the correct payment of all fees which may be due in connection with the filing and consideration of this communication.

Respectfully submitted,

Date: September 27, 2006	Burel C. Turkerz
	SIGNATURE OF PRACTITIONER
Reg. No. 27,840	David A. Tucker
	(type or print name of practitioner)
	Attorney for Applicant
	Edwards & Angell, LLP
Tel. No. (617) 517-5508	P. O. Box 55874
	P.O. Address
Customer No. 21874	Boston, MA 02205

558395v2